



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 15 2003

REPLY TO THE ATTENTION OF:

B-19J

Mr. John P. Debo, Jr., Superintendent  
Cuyahoga Valley National Park  
15610 Vaughn Road  
Brecksville, Ohio 44141

**Subject: Comments on the Draft Rural Landscape Management Program and Draft  
Environmental Impact Statement for the Cuyahoga Valley National Park,  
Cuyahoga and Summit Counties, Ohio. EIS# 030049**

Dear Mr. Debo:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the National Park Service's (NPS) Draft Environmental Impact Statement (DEIS) for the Draft Rural Landscape Management Program and Draft Environmental Impact Statement for the Cuyahoga Valley National Park. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act (CAA). The DEIS is registered in the CEQ database as document #030049.

To prevent the loss of rural landscape resources and character, the NPS is proposing to better protect and revitalize the CVNP by implementing an integrated rural landscape management program. The main objectives of the action alternatives in the DEIS are to:

1. *Continue the agricultural tradition.* Agricultural activity would be preserved on about four percent of parkland. Open rural landscapes without active farming would also achieve this objective.

We have rated the Preferred Alternative, the Countryside Initiative (2), as "EC-2 - Environmental Concerns, Insufficient Information." The rating reflects that we support the Countryside Initiative because of its encouragement of economically and biologically sustainable farming practices. However, we are concerned about the lack of a definition in planning for deer herd and invasive species control under that alternative. The DEIS articulated the need to control deer and invasive species in the rural landscape, and we encourage the NPS to further develop proposed answers to those needs in the FEIS. Please see the enclosed "Detailed Comments" for more information.

We appreciate the opportunity to review the DEIS. Please send only two copies of the final EIS (FEIS) to this office at the same time the document is officially filed with our Washington, D.C. Office. If you have any questions, please call Rosalyn Johnson of my staff at (312) 353-5692 or send email to [johnson.rosalyn@epa.gov](mailto:johnson.rosalyn@epa.gov).

Sincerely,



Kenneth A. Westlake  
Chief, Environmental Planning and Evaluation Branch  
Office of Strategic Environmental Analysis

Enclosures (2):      Summary of Ratings  
                         Detailed Comments

## **SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\***

### **Environmental Impact of the Action**

#### **LO-Lack of Objections**

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### **EC-Environmental Concerns**

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

#### **EO-Environmental Objections**

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### **EU-Environmentally Unsatisfactory**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS state, this proposal will be recommended for referral to the CEQ.

### **Adequacy of the Impact Statement**

#### **Category 1-Adequate**

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### **Category 2-Insufficient Information**

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### **Category 3-Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of

## **DETAILED COMMENTS**

### **Pest Management and Sustainable Agriculture**

The Cuyahoga Valley National Park's (CVNP) multiple management emphases should provide a unique opportunity for the National Park Service (NPS) to demonstrate that agriculture and nature can coexist sustainably. We support the NPS plan to monitor the effectiveness of buffer zones of various sizes as described in appendix H, the "SUMMARY OF WETLAND AND RIPARIAN BUFFER ZONES." According to the appendix, ongoing water quality monitoring and, potentially, more sensitive wetland monitoring tools will be used to assess buffer effectiveness in controlling soil and agricultural chemical movement.

U.S. EPA strongly supports the NPS in the use of environmentally sound agricultural practices. We support and recommend approaching pest control in an integrated manner, which incorporates:

- ◆ using a variety of effective physical, cultural, and mechanical approaches to pest control,
- ◆ carefully considering the environmental impacts of biological controls, since some past releases of insect predators and parasitic microbes, for example, have resulted in nontarget effects, and
- ◆ if necessary, using the least toxic agricultural chemicals available.

Information about many aspects of pesticide use are available on our website at <http://www.epa.gov/pesticides>, or at <http://npic.orst.edu/gen.htm>. Information specifically on agricultural pest control and integrated pest management is available at <http://www.epa.gov/pesticides/controlling/agriculture.htm>. Also feel free to contact Barbara VanTil at U.S. EPA's Region 5 office (312-886-3164) regarding integrated pest management and sustainable agriculture. We recommend that you ask your local county extension agents for assistance in identifying the least toxic pesticides available.

### **Deer Herd Impacts on Biodiversity**

Although forest and other wildlife habitat on the CVNP have been impacted by past uses, NPS noted in the DEIS a net conversion of approximately 1100 acres of open habitats

affected by the conversion, concentrating deer presence and browsing in the unconverted habitats. Because the indirect impact of shifting the deer herd is expected to exacerbate damage to remaining habitats ( e.g., upland and bottomland forest, wetlands, and wet meadows), and because higher rates of winter starvation and auto collisions are expected to result, we are concerned that the NPS has not articulated a plan for reducing the deer herd at CVNP. Also, an ill-fed deer herd is likely to form a local reservoir for infectious deer diseases (e.g., chronic wasting disease) that are already present in the Midwest. U.S. EPA recommends that the NPS:

- ◆ develops effective strategies to control deer populations at CVNP, and
- ◆ cooperates with and participates in federal, state, and local efforts to control the size of the deer herd.

#### Invasive Plant Species

We support the NPS plan to hold lands in reserve from agriculture to protect native plant and animal species and communities. However, we are concerned that the aggressive plant species that already have a foothold in the CVNP will continue to invade areas with native vegetation. We strongly recommend that the NPS establish a plan for long-term control of invasive plants, the goal being to eventually eliminate the risk to and encourage the restoration of native plant communities. A preliminary plan could be included in the appendices of the FEIS.

Executive Order 13112 on Invasive Species encourages:

- ◆ planting native species in preference to exotic species;
- ◆ planting non-aggressive, easily-controlled species when necessary for erosion control or other needs; and
- ◆ removing exotic plant and animal species in areas where they are becoming established.

According to the order, federal projects should be used to:

- ◆ prevent the introduction of invasive species;
- ◆ detect and control populations of invasive species in a cost-effective and

- ◆ conduct research and develop technologies to prevent introduction and provide for environmentally sound control of invasive species; and
- ◆ promote public education on these species and the means used to address the problem.

Aspects of federal land management projects that could cause or promote the introduction or spread of invasive species should not be authorized, funded, or carried out unless it can be established that the potential benefits of the project clearly outweigh the harm caused by the invasive species.